



Signed and Filed: December 17, 2020

DENNIS MONTALI  
U.S. Bankruptcy Judge

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UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re:

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**ORDER APPROVING  
STIPULATION ENLARGING  
TIME FOR JOHN DOWNHAM ET  
AL. TO FILE PROOFS OF CLAIM**

1 The Court having considered the *Stipulation Enlarging Time for John Downham et al. to*  
2 *File Proofs of Claim*, dated December 16, 2020 [Dkt. No. 9829] (the “**Stipulation**”),<sup>1</sup> entered into  
3 by PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”),  
4 as debtors and reorganized debtors (collectively, the “**Debtors**” or “**Reorganized Debtors**”) in  
5 the above-captioned cases (the “**Chapter 11 Cases**”), on the one hand, and John and Karen  
6 Downham (“**Movants**”), on the other hand; and pursuant to such Stipulation and agreement of the  
7 Parties, and good cause appearing,

8 IT IS HEREBY ORDERED THAT:

- 9 1. The Stipulation is approved.
- 10 2. The Amended Proofs of Claim are deemed timely filed.
- 11 3. The Proofs of Claim and the Asserted Fire Victim Claims shall for all purposes be  
12 treated and classified as Fire Victim Claims under the Plan, and shall be fully assumed by, and the  
13 sole responsibility of, the Fire Victim Trust and subject to the Channeling Injunction, to be  
14 administered, processed, settled, disallowed, resolved, liquidated, satisfied, and/or paid in  
15 accordance with the Fire Victim Trust Agreement and the Fire Victim Claims Resolution  
16 Procedures. Movants shall have no further recourse against the Debtors or Reorganized Debtors,  
17 as applicable, with respect to the Proofs of Claim or the Asserted Fire Victim Claims.
- 18 4. Nothing herein shall be construed to be a waiver by the Debtors or the Reorganized  
19 Debtors, as applicable, the Fire Victim Trust, or any other party in interest of any right to object to  
20 the Asserted Fire Victim Claims or the Proofs of Claim on any grounds other than the untimely  
21 filing thereof.
- 22 5. Nothing herein shall be construed to be a waiver by Movants of their right to assert  
23 any right in contravention to or in opposition of any asserted challenge to the Asserted Fire Victim  
24 Claims or the Amended Proofs of Claim.
- 25
- 26

27 <sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to  
28 them in the Stipulation.

1           6.       The Original Proof of Claim is deemed expunged, and Prime Clerk LLC, the claims  
2 agent appointed in the Chapter 11 Cases, shall be authorized to update the official claims register to  
3 reflect the terms set forth herein.

4           7.       The *Motion to Allow/Deem Timely Late Filing of Proof of Claim by John and Karen*  
5 *Downham* [Dkt. No. 9775] is deemed withdrawn with prejudice, and the Hearing vacated.

6           8.       The Stipulation is binding on the Parties and each of their successors in interest.

7           9.       The Stipulation constitutes the entire agreement and understanding of the Parties  
8 relating to the subject matter thereof and supersedes all prior agreements and understandings relating  
9 to the subject matter thereof.

10          10.      This Court shall retain jurisdiction to resolve any disputes or controversies arising  
11 from the Stipulation or this Order.

12                                   \*\*\* END OF ORDER \*\*\*

13 Dated: December 16, 2020

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15 SKIKOS, CRAWFORD, SKIKOS & JOSEPH, LLP

16 /s/ *Steven Skikos*

17 Steven Skikos, Esq.

18 *Attorneys for John and Karen Downham*  
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